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U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

April 6, 2021

BY ECF

The Honorable Paul G. Gardephe United States District Judge United States Courthouse 40 Foley Square New York, N.Y. 10007

Re: United States v. Stuart Finkelstein, 21 Cr. 217 (PGG)

Dear Judge Gardephe:

A pretrial conference in this matter is scheduled for May 11, 2021. The Government respectfully requests, with the consent of the defense, that the Court exclude time, pursuant to 18 U.S.C. § 3161(h)(7)(A), from today until that conference. The proposed exclusion would permit the parties to negotiate a protective order to govern discovery; for the Government to begin producing discovery; and for the defendant to travel to New York City on May 11, 2021 to attend the *Curcio* hearing. The Government submits that the ends of justice served by the exclusion outweigh the best interest of the public and the defendant in a speedy trial.

Respectfully submitted,

AUDREY STRAUSS United States Attorney

hw.

Rushmi Bhaskaran

Assistant United States Attorney

(212) 637-2439

cc: Brian Griffin, Esq. (by ECF)